

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE**

Laurie Ortolano,
Plaintiff,

v.

The City of Nashua, *et al.*,
Defendants.

Civil Action No. 1:22-cv-00326-LM

AFFIDAVIT OF MICHAEL CARIGNAN

Michael Carignan hereby deposes and says:

1. I am over the age of 18 and have personal knowledge of the facts set forth in this affidavit.
2. At all times relevant hereto, I served as Chief of the Nashua Police Department (“NPD”), retiring at the end of 2021.
3. On January 22, 2021, Nashua Police Officer Timothy Roach and Sgt. Christopher Caron responded to a call from the City’s City Hall concerning an incident involving Laurie Ortolano, who reportedly was refusing to leave an area in or around the Legal Department.
4. At that time, the officers reportedly informed Ms. Ortolano that she was being directed by the Legal Department not to return and that she could be subject to arrest for trespass if she violated that direction.
5. The following day, the Union Leader published statements from Ms. Ortolano acknowledging that she had been asked by legal counsel to leave and had refused to do so.
6. The City’s Legal Counsel asked the NPD to further investigate the matter, which it did.

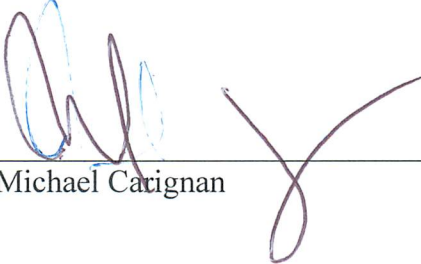
7. Officer Roach interviewed several witnesses, including Mindy Lloyd, Jesse Neumann, and Celia Leonard, all of whom stated that they were present on the date of the incident and had advised Ms. Ortolano that she was not welcome at and needed to leave the Legal Department but that she refused to do so.

8. Based on his investigation, Officer Roach sought and obtained an arrest warrant and charged Plaintiff with Criminal Trespass. On information and belief, Ms. Ortolano subsequently pleaded guilty to a violation-level criminal trespass offense.

9. The City of Nashua has a Police Commission that oversees the NPD, and the Legal Department has no authority to order or influence its actions.

10. The decision to charge the plaintiff was based on the investigation of the NPD officers and was not in retaliation for any actions or statements of the plaintiff regarding City administration.

Subscribed and sworn to under the pains and penalties of perjury this 5 day of ^{March}~~February~~, 2024.



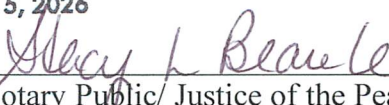
Michael Carignan

STATE OF NEW HAMPSHIRE
COUNTY OF HILLSBOROUGH

Sworn to and subscribed before me by Michael Carignan, this 5 day of ^{March}~~February~~, 2024.

STACY L. BEAULE
Notary Public - New Hampshire
My Commission Expires May 5, 2026





Notary Public/ Justice of the Peace
Print Name: STACY L Beaule
My Commission Expires: 5/5/2026